

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

THOMAS E. STEVENS (CABN 168362)
Assistant United States Attorney

450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: Thomas.Stevens@usdoj.gov

Attorney for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR-12-0459 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME
)	UNDER THE SPEEDY TRIAL ACT
)	
v.)	
)	
)	
MYRA B. MINKS, TIFFANY T. CONLEY,)	
LETITIA R. MAYS, and ANDREA C.)	
MOHR,)	
)	
Defendants.)	
)	

WHEREAS, the above-captioned matter came before the Court on November 28, 2012, for status conference. The United States was represented by AUSA Tom Stevens. Defendant Minks was represented by Gail Shifman, defendant Conley (who was not present, due to illness) was represented by Tim Crudo, defendant Mays was represented by Brian Berson, and defendant Mohr was also represented by Mr. Berson, who was specially appearing for Mohr's counsel, Brendan Conroy. The Court set the case for a further status conference on January 16, 2013.

WHEREAS, based upon prior orders of the Court, time has been excluded under the Speedy

STIP. AND [PROPOSED] ORDER RE: STA
CR-12-0459 EMC

1 Trial Act (18 U.S.C. § 3161) through and including November 28, 2012, for effective preparation
2 of counsel.

3 NOW THEREFOR, based upon the need for counsel for the government and for the
4 defendants effectively to prepare, the parties seek a further exclusion of time under the Speedy Trial
5 Act, through and including January 16, 2013.

6 SO STIPULATED.

7 DATED: November 28, 2012

MELINDA HAAG
United States Attorney

8
9 /s

10 Thomas E. Stevens
Assistant United States Attorney

11 DATED: November 28, 2012

12 /s

13 Gail Shifman
Counsel to Myra Minks

14 DATED: November 29, 2012

15 /s

16 Timothy Crudo
Counsel to Tiffany Conley

17 DATED: November 28, 2012

18 /s

19 Brian Berson
Counsel to Letitia Mays

20 DATED: November 28, 2012

21 /s

22 Brendan Conroy
Counsel to Andrea Mohr

23 **[PROPOSED] ORDER**

24 Based upon the above stipulation, the Court finds that the time from and including
25 November 28, 2012, to and including January 16, 2013, should be excluded under the Speedy
26 Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the ends of justice served by the continuance
27 outweigh the best interest of the public and defendants in a speedy trial. The findings are based
28 upon the need for the defendants and the government to have reasonable time necessary for

1 effective preparation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), taking into account the exercise
2 of due diligence.

3 IT IS SO ORDERED.

4
5 DATED: November ²⁹ ___, 2012

